

Exhibit B

Definitions

1. “Debtor” shall mean Image Rent A Car, Inc., the debtor corporation who filed the voluntary petition.
2. “Case” shall mean the Debtor’s bankruptcy case pending in the Bankruptcy Court for the Eastern District of New York, Brooklyn Division (11-42391-JBR), which was filed under Chapter 7 pursuant to Title 11 of the United States Code on March 24, 2011.
3. All other definitions shall be those as set forth in Rule 26.3 of the Local Civil Rules for the Southern and Eastern Districts of New York.

Instructions

1. Unless otherwise agreed, all documents are to be produced in their original form and in the form they are maintained in the ordinary course of business.
2. The use of a verb in any tense shall be construed as the use of that verb in all other tenses, wherever necessary to bring within the scope of the document request all responses which might otherwise be construed to be outside its scope.
3. If any document requested has been lost, discarded, destroyed stolen or otherwise disposed of, you are required to provide, in lieu of a true and correct copy thereof, a description of such document indicating: (a) the date of the document; (b) brief description of the document; (c) the author and all recipients of the document; and (d) the date upon which the document was lost, discarded, destroyed, stolen or otherwise disposed of.

4. The following requests are continuing. Should responsive documents, not previously produced, come to your attention and/or become subject to your control or that of your attention and/or become subject to your control or that of your attorneys, employees, agents, or other representatives at any time before the conclusion of the Bankruptcy Case, they shall be produced forthwith.
5. The following requests seek production of all documents in their entirety without abbreviation, omission or expurgation.
6. All documents are to be produced as they are kept in the usual course of business with any identifying labels, file markings or similar identifying features or shall be organized and labeled to correspond to the appropriate document request herein. If there are no documents responsive to any particular document request, indicate this in response to that document request.

Document Requests

1. Federal & State Income tax returns, including all schedules, for the six most recent taxable periods prior to the Debtor's Chapter 7 case including the 2010 tax year.
2. Copies of the Debtor's account statements for any and all depository and investment accounts for the three calendar years preceding the filing of the Debtors' Chapter 7 case;
3. Articles of Incorporation and By-Laws;
4. Invoices or other proof of any and all liabilities Debtor owes to any and all creditors;
5. Copies of any and all books and records that refer, relate to or otherwise concern the Debtor
6. Copies of all documentation evidencing a transfer, gift or other payment of any proceeds or property by the Debtor to any creditors, individuals, companies or other entities.;

7. Full and complete copies of all documents evidencing Shneior Zilberman as president of the Debtor corporation

Dated: New York, New York
July 15, 2011

Respectfully submitted,

By: _____/s/_____
Daniel Gershburg, Esq.
100 Church Street, 8th Floor
New York, New York 10007
Tel. No. (718) 989-0765